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MAR 20 1986

Mr. Bryan W. Dixon, Director
Hazardous and Solid Waste Division
Texas Water Commission
Post Office Box 13087, Capitol Station
Austin, Texas 78701

Re: ~~Gulf Coast Waste Disposal Authority~~
American Plant, Texas City
EPA I.D. No TXD 980625990

Dear Mr. Dixon:

Enclosed is a copy of the inspection report completed by Region 6 during its lead inspection at Gulf Coast Waste Disposal on January 20, 1986. It is noted that while Region 6 conducted the lead inspection at the facility, the Texas Water Commission (TWC) is expected to initiate the enforcement action, if necessary. Possible violations found at Gulf Coast Waste Disposal include:

A. Generator's Checklist

1. Section E-Recordkeeping and Recording

- * Generator is not keeping records of test results for a minimum of three (3) years.

40 CFR 262.40(c) / TAC 335.70(a) pg. 6 (Class II)

B. TSD Facilities Checklist

1. Waste Analysis

- * Facility's waste analysis plan does not address the parameters for which each waste is analyzed and/or the rationale for the selection of those parameters.

40 CFR 265.13(b) / TAC 335.114(b) pg. 8 (Class II)

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C. Closure and Post-Closure

- * The owner/operator did not include in the closure plan when the facility would be partially, then finally closed.
40 CFR 265.112(a)(1) / TAC 335.213 pg. 26 (Class II)
- * The closure plan does not include an up-to-date estimate of the maximum inventory of waste in storage and in treatment at any time during the life of the facility.
40 CFR 265.112(c)(2) / TAC 335.213(a)(2) pg. 26 (Class II)
- * The closure plan does not include an estimate of the expected year of closure nor a schedule for final closure.
40 CFR 265.112(a)(4) / TAC 335.213(a)(4) pg. 26 (Class II)

During the inspection it was noted that although the waste analysis plan does not list parameters, the waste are analyzed for EP toxic metals, pesticides, herbicides, reactivity, corrosion rate, flash point, and pH. It was also noted in the report that the facility's inspection recordkeeping personnel training plan and contingency plan have improved since the last inspection conducted on June 26, 1985. No problems in these areas were noted, however, the same closure plan problems noted in the June 26, 1985, inspection are noted in the January 20, 1986, inspection.

It is also noted in the January 20, 1986, report that this facility has applied for an exclusion under TAC 335.2(F) which is for a wastewater treatment unit. A copy of the affidavit of exclusion submitted by the facility is enclosed along with a copy of the January 20, 1986, inspection report.

Based on the violations described above, EPA would issue this facility a §3008 Warning Letter.

Should you have any questions or comments, or disagree with any of our findings or recommendations, please contact me at (214) 767-9730 or have your staff contact Steve Chatelain at (214) 767-9726.

Sincerely yours,

William H. Taylor, Jr., Chief
Enforcement Section (6H-CE)

Enclosure

bcc: G. Reiter (6H-HO)
D. Peters (6H-SH)
R. Hannechlager (6H-E) ✓
L. Thompson (6H-CE)